

REMARKS

Claims 1-30 were previously pending in this patent application. Claims 1-30 stand rejected. Herein, Claims 1, 11, and 21 have been amended. Accordingly, after this Amendment and Response, Claims 1-30 remain pending in this patent application. Further examination and reconsideration in view of the claims, remarks, and arguments set forth below is respectfully requested.

35 U.S.C. Section 102(e) Rejections

Claims 1-8, 10-18, 20-28, and 30 stand rejected under 35 U.S.C. 102(e) as being anticipated by Robbins et al., U.S. Patent Application Publication No. US2002/0198657 (hereafter Robbins). These rejections are respectfully traversed.

Independent Claim 1 recites (as amended):

A method for delivering Virtual Reference Station (VRS) data derived by a VRS network processor at a VRS control station for a designated location to a mobile position determination unit with a terrestrial communications link, said method comprising:

creating a data message comprising pseudorange data derived for said designated location and pseudorange corrections for a designated region surrounding said designated location;

sending said data message via ***a cellular telephone connection from said VRS control station to a base station*** located in the designated region surrounding said designated location;

transmitting said data message ***from said base station to a mobile position determination unit*** using a radio transmitter ***independent*** of said cellular telephone connection. (emphasis added)

It is respectfully asserted that Robbins does not disclose the present invention as recited in Independent Claim 1. In particular, Independent Claim 1 recites the limitations, "***sending*** said data message via ***a cellular telephone connection from said VRS control station to a base station***," (emphasis added), and "***transmitting*** said data message ***from said base station to a mobile position determination unit*** using a radio transmitter ***independent of said cellular telephone connection***," (emphasis added). In the Office Action (at page 2), it is stated that the VRS control station of Independent Claim 1 corresponds to the infrastructure (105) for generation of correction data from GPS satellite signals of Robbins. Also, it is argued in the Office Action that the distribution system (110) of Robbins discloses the limitations "sending...via a cellular telephone connection..." and "transmitting...using a radio transmitter..." of Independent Claim 1 because delivery media of the distribution system (110) comprises delivery to GSM telephones via GSM network and because GSM networks consist of base stations, transmitters, etc. According to arguments in the Office Action, the GSM network's base stations and transmitters, which represent the cellular telephone connection, accomplish the sending and transmitting recited in Independent Claim 1.

However, Independent Claim is directed to sending the data message via a cellular telephone connection from the VRS control station to a base station and is directed to transmitting the data message from the base station to a mobile position determination unit using a radio transmitter independent of the cellular telephone connection. Since the GSM network's base stations and

transmitters represent the cellular telephone connection, the transmitters are not independent of the cellular telephone connection, as in the invention of Independent Claim 1. As a result, Robbins fails to show sending the data message via a cellular telephone connection from the VRS control station (or infrastructure (105)) to a base station and transmitting the data message from the base station to a mobile position determination unit using a radio transmitter independent of the cellular telephone connection, as in the invention of Independent Claim 1. Therefore, it is respectfully submitted that Independent Claim 1 is not anticipated by Robbins and is in condition for allowance.

Dependent Claims 2-8 and 10 are dependent on allowable Independent Claim 1, which is allowable over Robbins. Hence, it is respectfully submitted that Dependent Claims 2-8 and 10 are patentable over Robbins for the reasons discussed above.

With respect to Independent Claims 11 and 21, it is respectfully submitted that Independent Claims 11 and 21 recite similar limitations as in Independent Claim 1. In particular, Independent Claims 11 recites the limitation, "radio transmitter independent of said cellular telephone connection," while Independent Claim 21 recites the limitation, "radio transmitter independent of said cellular telephone network". Robbins does not disclose the cited claim limitations of Independent Claims 11 and 21. Therefore, it is respectfully submitted that Independent Claims 11 and 21 are patentable over Robbins and

are in condition for allowance for reasons discussed in connection with Independent Claim 1.

Dependent Claims 12-18 and 20 and Dependent Claims 22-28 and 30 are dependent on allowable Independent Claim 11 and 21, respectively, which are allowable over Robbins. Hence, it is respectfully submitted that Dependent Claims 12-18 and 20 and Dependent Claims 22-28 and 30 are patentable over the Robbins for the reasons discussed above.

35 U.S.C. Section 103(a) Rejections

Claims 9, 19, and 29 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Robbins et al., U.S. Patent Application Publication No. US2002/0198657 (hereafter Robbins), in view of Friedman, WO 01/50151 A1 (hereafter Friedman). These rejections are respectfully traversed.

Dependent Claim 9, 19, and 29 are dependent on allowable Independent Claims 1, 11, and 21, respectively, which are allowable over Robbins. Moreover, Friedman does not disclose sending the data message via a cellular telephone connection from the VRS control station to a base station and transmitting the data message from the base station to a mobile position determination unit using a radio transmitter independent of the cellular telephone connection, as in the invention of Independent Claims 1, 11, and 21. Hence, it is respectfully submitted that Independent Claims 1, 11, and 21 are patentable

over the combination of Robbins and Friedman for the reasons discussed above. Therefore, it is respectfully submitted that Dependent Claims 9, 19, and 29 are patentable over the combination of Robbins and Friedman for the reasons discussed above.

CONCLUSION

It is respectfully submitted that the above claims, arguments, and remarks overcome all rejections. All remaining claims (Claims 1-30) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 1-30) are in condition for allowance.

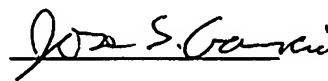
The Examiner is urged to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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Dated: 12/12/2005



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